

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director
and Attorney-in-Chief

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

July 6, 2023

BY ECF

Honorable Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Jesus Rios Quintero
19 Cr. 307 (SHS)

Dear Judge Stein:

I represent defendant Jesus Rios Quintero in the above-captioned case. I write to request a bail modification to permit Mr. Rios to travel to Pennsylvania to visit his sister between July 23 and July 24, 2023. Mr. Rios has pled guilty and is currently awaiting sentencing. He was released on bail in November 2021, and has been residing in the community since that time without any bail violations or other issues. He is currently employed and lives with his partner and child.

I have conferred with Pretrial Services Officer Ashley Cosme, who informs me that Pretrial objects to this request because "Pretrial objects to all overnight travel for individuals on home confinement." I have also conferred with AUSA Ryan Finkel on behalf of the government, who has no objection to this travel. Thank you for consideration of this request.

Respectfully submitted,
/s/ Sarah Baumgartel
Sarah Baumgartel
Assistant Federal Defender
Tel.: (212) 417-8772

cc: AUSA Ryan Finkel (by ECF)

7/6/2023
Application approved
5010
J. H. Stein
U.S.D.S.